

## ▶ JOB APPLICANT PRIVACY NOTICE

This Privacy Notice sets out how the Club uses and protects the personal data of individuals applying for employment.

As part of our recruitment process, the Shipowners' Mutual Protection and Indemnity Association (Luxembourg) ("the Club") collects and processes personal data relating to job applicants.

The Club is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

### **What we collect**

The Club collects a range of personal data about job applicants. This can include:

- name, address and contact details, including email address and telephone number;
- details of qualifications, skills, experience and employment history;
- information about current level of remuneration, including benefit entitlements;
- whether or not the applicant has a disability for which we must make reasonable adjustments during the recruitment process;
- information about entitlement to work in the UK; and

### **How we collect data**

The Club may collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from passport or other identity documents, or collected through interviews or other forms of assessment.

In the event that a job offer is made, the Club may also collect personal data from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks.

Data will be stored in a range of different places, including an application record, in HR management systems and on other IT systems (including email).

### **What we do with the information we gather**

The data you send the Club will be used to enable us to make selection assessments and where appropriate make offers of employment. The Club needs to process data to take steps at the data subjects request prior to entering into a contract.

In some cases, the Club needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

The Club has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows the Club to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The Club may also need to process data from job applicants to respond to and defend against legal claims.

The Club may process information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

The Club does not routinely process other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief.

If your application is unsuccessful, the Club may keep your personal data on file in case there are future employment opportunities for which you may be suited. The Club will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time.

There are no circumstances where recruitment decisions are based solely on automated decision-making.

### **Access to data**

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

The Club will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment.

Your data may be transferred to countries outside the European Economic Area (EEA). Data may be transferred electronically to our offices outside the EEA which are within our secure IT network. Where data is transferred to third parties outside of our secure network, this will only be done where there is a valid and lawful reason for the transfer and where appropriate safeguards are in place such as recognition as an equivalent jurisdiction by the Information Commissioner Officer, or binding corporate rules.

### **Data Security**

The Club takes the security of personal data seriously. It has internal policies and controls in place to ensure that data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

### **Data retention**

If your application for employment is unsuccessful, the Club will hold your data on file for one year after the end of the relevant recruitment process. At the end of that period (or if you withdraw consent), your data will be deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained in line with the Club's Retention of Records Policy. The periods for which your data will be held will be provided to you in a new privacy notice.

### **Your rights**

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the Club to change incorrect or incomplete data;

- require the Club to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where the Club is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact Sarah Chamberlain, Risk and Compliance Officer, or speak to a member of the HR team.

If you believe that the Club has not complied with your data protection rights, you can escalate it to the Information Commissioner.

### **Your responsibility to provide data**

You are under no statutory or contractual obligation to provide data to the Club during the recruitment process. However, if you do not provide the information, the Club may not be able to process your application properly or at all.